ENVIRON

July 3, 1997

Federal Express

US EPA RECORDS CENTER REGION 5
464637

Ms. Sheri Bianchin
USEPA Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Re: Analytical Data for the ACS NPL Site - Electronic Database and Map

Dear Ms. Bianchin:

Please find enclosed the electronic database and map of the analytical data for the American Chemical Services (ACS) NPL Site. This interim deliverable is the third item on the risk assessment schedule outlined with EPA during our June 11 meeting in Chicago. To date, we have not received the relevant EPA policies that were to be provided with the comments on the Scope of Work on June 27 (second item on the schedule).

The enclosed Microsoft Access (version 2.0) database (ACS.mdb) contains analytical data collected from 1989 through 1997. This database is divided into the following tables: LOADGW, LOADSW, LOADSED, LOADSOIL, LOADQAQC, GW_TICS, and COORDS. Currently, only the tentatively identified compounds from the 1994 round of ground water samples are available in electronic format and are included in the database. Per your request, we are also forwarding a copy of the database and map to Dane Pehrman at Black & Veatch.

At the June 11 meeting, you requested that we identify potential gaps in the data available for estimating human health risks associated with the ACS Site. Based on our review of the data to date, there are no significant gaps in the data. The only potential weakness in the set of available data is associated with surface soil sampling.

Although the discussion at the June 11 meeting indicated that surface soil samples are not available beyond the Kapica-Pazmey Area, at least one surface soil sample was collected from the ACS manufacturing area. The soil area sample (SA-3) was collected on-site at the ACS property, near the former incinerator area. As reported in the Remedial Investigation (RI) Report,

> "The sample consisted of surficial soil material, collected from a depth of 6 to 18 inches and composited from five discrete areas into a single sample. The sample was analyzed for full TCL and TAL parameters. Phase I results indicated that additional sampling would not be necessary, since relatively low levels of contaminants were found at this location." (p. 3.3)

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Thus, surface soil data are available for the "Manufacturing area".

During the RI, EPA agreed that collection of additional surface soil samples was not necessary in other areas of the ACS Site because these areas were previously covered by several feet of clean fill material. The addition of this cover to the ACS property has been reported in descriptions of the history of the Site and the presence of the cover is apparent upon visual inspection of the Site. In addition, ACS maintains a six-inch aggregate cover over the manufacturing area that prevents contact with soils at the facility. ACS also provides regular maintenance of the cover on the roads at the facility. As discussed in the RI Report,

> "it was decided between the RPM and Warzyn during the field staking exercise prior to Site work that soil area samples collected in this location [the On-Site Containment Area] would not benefit the investigation because it was unlikely that the soils were contaminated. This conclusion was reached because of knowledge of past activities, recent filling and grading, and because of the high permeability of the soils. It was assumed that the high permeability would facilitate volatilization and natural washing due to precipitation." (page 3.3)

Thus, the amount of data currently available for evaluating surface soil exposures is not a data gap, but rather reflects the acknowledged presence of the clean cover under baseline conditions.

If you have any questions regarding this transmittal, please contact me at (609) 243-9805 or Mary Cottingham at (609) 243-9847.

Sincerely,

Kristen G. Edelmann

Kristen G. Edelmann
Senior Associate

Enclosure
cc: Steve Mrkvicka, Black & Veatch
Dane Pehrman, Black & Veatch (with enclosure)
Christopher Brown, IDEM
ACS Technical Committee